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**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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J.D. and R.D.

Plaintiffs

v.

BENJAMIN PRICE; SULZER TURBO SERVICES  
NEW ORLEANS, INC.; DELTA AIR LINES, INC.;  
OHIO VALLEY BISTROS, INC., HOST  
INTERNATIONAL, INC., and HMSHOST  
CORPORATION

Defendants

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CIVIL ACTION

CASE NO. 2:20-cv-749

**JOINT MOTION *IN LIMINE* OF DEFENDANTS, DELTA AIR LINES, INC. AND  
BENJAMIN PRICE, TO EXCLUDE RECORDS NOT PRODUCED DURING  
DISCOVERY AND ANY TESTIMONY RELATING TO SUCH RECORDS**

Defendant Delta Air Lines, Inc. (“Delta”) and Defendant Benjamin Price (“Price”) jointly move this Court, pursuant to Rule 37(c) of the Federal Rules of Civil Procedure and Rule 403 of the Federal Rules of Evidence, to exclude the 2022 treatment records from Virginia Holm, LCSW, which were not produced during discovery and any testimony from Ms. Holm relating to such records, for the reasons set forth in the accompanying memorandum of law.

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Respectfully submitted,

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*Attorneys for Defendant Delta Air Lines, Inc.*

Date: September 19, 2022

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Date: September 19, 2022